



CALIFORNIA DEPARTMENT OF  
FOOD & AGRICULTURE

A. G. Kawamura, Secretary

April 1, 2008

Dear EATF members,

I'm writing to update you on the status of the light brown apple moth acute toxicity and environmental toxicity tests. The United States Department of Agriculture (USDA) is contracting a battery of acute toxicity tests, commonly called the "six pack," on all the formulated products currently in consideration. These tests are being done in response to a United States Environmental Protection Agency (EPA) request. The CDFA has decided to conduct more fresh water aquatic toxicity tests with the Department of Fish and Game's Pesticide Investigation Unit with all four formulations. The CDFA is also in the process of contracting with a private laboratory to do marine larval mussel toxicity tests. These tests will all be conducted according to the highest research standard, Good Laboratory Practice.

The USDA currently has four formulations of the pheromone from efficiency tests in Australia. The results of these tests will help determine which pheromone formulation is used in 2008. The goal is to use a formulation that has a long duration in the field, reducing the number of needed applications.

The "six pack" of acute toxicity tests are as follows: Acute Oral Toxicity, Acute Dermal (skin) Toxicity, Acute Inhalation Toxicity, Skin Sensitization, Acute Eye Irritation and Acute Dermal Irritation. These are standard registration tests required by the United States Environmental Protection Agency and California Department of Pesticide Regulation. The dermal toxicity, skin sensitization and dermal irritation tests are similar, but look for different effects. Based on the toxicity data discussed in the environmental assessments, I do not expect the pheromone to have any effect in these tests.

The freshwater aquatic toxicity tests are acute toxicity tests using the following organisms: waterflea, algae, fathead minnow, rainbow trout, and bullfrogs. The bullfrogs were chosen to represent amphibians. Amphibian toxicology information was a specific EATF request. The marine test will be for larval mussels survival and development.

All of these tests will be conducted according to Good Laboratory Practice protocols (GLP). This standard requires that laboratories be registered and inspected regularly by the EPA and/or other agencies. Quality assurance personnel inspect "critical" phases of procedures and can inspect research logs and reports. Quality Assurance Officers are certified, and are independent of the laboratories. GLP standards were instituted to ensure that research be conducted with the highest ethical standards and the test results and data interpretation be reliable. As a general rule, the



EATF Members  
April 1, 2008  
Page 2

EPA requires all toxicology and environmental data required for registration to be conducted according to GLP standards.

During our previous meetings, EATF member(s) have expressed an interest in independent environmental toxicology studies. I believe that these toxicity tests, conducted according to the highest research standard, will meet this need.

Sincerely,

A handwritten signature in blue ink, appearing to read "Robert Leavitt", with a long horizontal flourish extending to the right.

Robert Leavitt, Ph.D.  
Branch Chief, EATF